

JUDGE KAPLAN

08 CV 03343

Michael J. Frevola
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ATTORNEYS FOR PLAINTIFF
INGOSSTRAKH JOINT STOCK INSURANCE
COMPANY LIMITED OF RUSSIA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

INGOSSTRAKH JOINT STOCK INSURANCE
COMPANY LIMITED OF RUSSIA,

Plaintiff,

-against-

WUXI ANTAI POWER MACHINERY CO. LTD.,

Defendant.

08 Civ. _____

**AFFIDAVIT IN SUPPORT
OF REQUEST FOR AN
ORDER APPOINTING
PERSONS TO
SERVE PROCESS**

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)


Michael J. Frevola, being duly sworn, deposes and says:

1. I am a member of the firm of Holland & Knight LLP, attorneys for plaintiff Ingosstrakh Joint Stock Insurance Company Limited of Russia ("Plaintiff"), and I am duly admitted to practice before the United States District Court for the Southern District of New York. I am fully familiar with all the facts in the above case.


2. This affidavit is made in support of Plaintiff's application for an Order to appoint Elvin Ramos and/or Rudy D. Green and/or Jerome Wills and/or Willis Vargas and/or Rapid and Reliable Attorney Service, individuals or representatives of whom are all over 18 years of age and are not a party to or an attorney in this action, to serve the Writ and Order of Attachment and Garnishment, Summons, Verified Complaint, Affidavit in Support and Interrogatories on the Garnishees.

3. The granting of this request will result in a material savings in process and travel expenses.

WHEREFORE, it is respectfully requested that the Order be granted appointing Elvin Ramos, Rudy D. Green, Jerome Wills, Willis Vargas, a person from Rapid and Reliable Attorney Service, or any one of them to serve process in this matter upon the above named defendant and the garnishees.


Michael J. Frevola

Sworn to before me this
3rd day of April, 2008


Notary Public

5236932_v1
Linda M. Wilkens
Notary Public, State of New York
No. 01W19672455
Qualified in Queens County
Certificate filed in New York County
Commission Expires September 30, 2010